

1 TODD KIM  
2 Assistant Attorney General  
3 Environment and Natural Resources Division  
4 United States Department of Justice

5 LEILANI DOKTOR (HI Bar 11201)  
6 ARWYN CARROLL (MA Bar 675926)  
7 Natural Resources Section  
8 P.O. Box 7611  
9 Washington, D.C. 20044-7611  
10 Phone: (202) 305-0447  
11 Fax: (202) 305-0506  
12 leilani.doktor@usdoj.gov  
13 arwyn.carroll@usdoj.gov

14 *Attorneys for Federal Defendants*

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 BARTELL RANCH LLC, *et al.*,  
18 Plaintiffs,  
19 v.

20 ESTER M. MCCULLOUGH, *et al.*,  
21 Defendants.

22 WESTERN WATERSHEDS PROJECT,  
23 *et al.*,  
24 Plaintiffs,  
25 v.

26 UNITED STATES DEPARTMENT OF  
27 THE INTERIOR, *et al.*,  
28 Defendants.

Case No. 3:21-cv-80-MMD-CLB  
Related Case No. 3:21-cv-103-MMD-CLB  
(Consolidated)

**FEDERAL DEFENDANTS’  
NOTICE OF MANUAL FILING OF  
THE REVISED ADMINISTRATIVE  
RECORD**

1 Federal Defendants hereby give notice that they will lodge with the Court on  
2 February 11, 2022, one flash drive containing the administrative record for the above-  
3 captioned case. Federal Defendants have revised the administrative record pursuant to  
4 this Court's December 27, 2021 Order. ECF No. 155. Attached to this notice are the  
5 certification of the administrative record (Exhibit 1), the indices to the administrative  
6 record (Exhibit 2 & 3), and a privilege log.

7 A courtesy copy of the administrative record and transmittal letter were hand  
8 delivered to the Court on February 11, 2022. Copies of the administrative record were  
9 also sent to counsel for Plaintiffs, Plaintiff-Intervenor and Defendant-Intervenor.

10 The documents have been recorded in PDF format on the flash drive. To the  
11 extent a user alters the files, the altered files will no longer reflect the information used  
12 by the agency to make the decision challenged in this case and will be extra-record  
13 evidence.

14 The files on the flash drive have been consecutively Bates stamped. Also included  
15 on the drive is an index to the administrative record. The document numbers in each  
16 index entry have been hyperlinked to the corresponding file for convenient navigation.

17  
18 Respectfully submitted this 11th day of February 2022.

19  
20 TODD KIM  
21 Assistant Attorney General  
22 United States Department of Justice  
Environment and Natural Resources Div.

23 /s/ Leilani Doktor  
24 LEILANI DOKTOR (HI Bar 11201)  
25 ARWYN CARROLL (MA Bar 675926)  
26 Trial Attorney  
27 Natural Resources Section  
28 P.O. Box 7611  
Washington, D.C. 20044-7611  
Phone: 202-305-0465  
Fax: 202-305-0506

leilani.doktor@usdoj.gov  
arwyn.carroll@usdoj.gov

*Attorneys for Federal Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that service of the foregoing FEDERAL DEFENDANTS' NOTICE OF MANUAL FILING OF THE ADMINISTRATIVE RECORD was made through the Court's electronic filing and notice system (CM/ECF).

Dated: February 11, 2022.

/s/ Leilani Doktor  
LEILANI E. DOKTOR